

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

v.

CITY OF BOSTON, STANLEY BOGDAN,  
JOHN MULLIGAN, WILLIAM KEOUGH,  
PAUL RUFFO, KATHLEEN HANLEY  
JOHNSON, and JOHN DOE and JANE DOE,  
supervisors in the Boston Police Department,

Defendants.

C.A. No. 04-10986-NG

**ASSENTED-TO MOTION TO ENLARGE TIME  
TO RESPOND TO DEFENDANTS STANLEY BOGDAN  
AND CITY OF BOSTON'S MOTION FOR LEAVE TO AMEND**

Plaintiff Ulysses R. Charles hereby respectfully submits this assented-to motion to enlarge the period for filing a response to the Motion for Leave to Amend Answers to Plaintiff's Complaint to Add an Affirmative Defense by Defendants Stanley Bogdan and City of Boston, from September 23, 2005 to October 14, 2005. As grounds for this motion, Mr. Charles states as follows:

1. Defendants Stanley Bogdan and the City of Boston have assented to the relief requested herein and will not be prejudiced by the allowance of this motion.
2. Defendants' motion for leave to amend the Complaint seeks to add the affirmative defense of statute of limitations.
3. Mr. Charles seeks enlargement of the time for responding to the motion due to the intense litigation schedule of his counsel.

4. In light of the seriousness of the potential assertion of a statute of limitations defense, and the equity considerations inherent in this case, Mr. Charles respectfully requests that the Court grant the enlargement of time sought.

WHEREFORE, Mr. Charles respectfully requests, in the interests of justice and for all of the forgoing reasons, that the Court grant this assented-to motion and allow him until October 14, 2005 to file his response to the Motion for Leave to Amend.

DATED: September 23, 2005  
Boston, MA

Respectfully submitted,

/s/ Mayeti Gametchu  
Kevin J. O'Connor (BBO# 555250)  
Mayeti Gametchu (BBO# 647787)  
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Boston, MA 02110  
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Attorneys for Plaintiff  
ULYSSES RODRIGUEZ CHARLES

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to L.R. D.Mass. 7.1(A)(2), I, Mayeti Gametchu, hereby certify that I conferred with counsel for Defendants Stanley Bogdan and the City of Boston on September 22 and 23, 2005. Counsel for Defendants Stanley Bogdan and the City of Boston assents to the relief sought in the instant motion.

/s/ Mayeti Gametchu

**CERTIFICATE OF SERVICE**

I, Mayeti Gametchu, hereby certify that, on September 23, 2005, I caused a true and correct copy of the foregoing document to be served by first-class mail, postage pre-paid, upon counsel for Defendants Stanley Bogdan and the City of Boston, Thomas Donohue, Esq., Assistant Corporation Counsel, City of Boston Law Dept., City Hall, Room 615, Boston, MA 02201.

/s/ Mayeti Gametchu